

EXHIBIT "G"

1 KENNER LAW FIRM, P.C.
2 David E. Kenner, SBN 41425
3 Brett A. Greenfield, SBN 217343
4 16000 Ventura Boulevard, PH 1208
5 Encino, CA 91364
6 818 995 1195
7 818 475 5369 - fax

8 WADE, KELLY & SULLIVAN
9 733 W. 4th Avenue, Suite 200
10 Anchorage, Alaska 99501
11 (907) 561-7743
12 (907) 562-8977 - fax
13 Attorney for Defendant Josef F. Boehm

14 IN THE UNITED STATES DISTRICT COURT

15 DISTRICT OF ALASKA

16 Sally C. Purser,)
17 Plaintiff,) DEFENDANT JOSEF BOEHM'S SECOND
18 v.) SET OF DISCOVERY REQUESTS TO
19) PLAINTIFF
20 Josef F. Boehm, Allen K.)
21 Bolling, and Bambi Tyree,)
22 Defendants.)
23)
24)
25)
26)
27)
28)
29) CASE NO.: A05-0085 (JKS)

30 DEFENDANT'S SECOND SET OF DISCOVERY REQUESTS

31 Pursuant to Federal Rules of Civil Procedure 26 and 36, the
32 Plaintiff requests that Defendant Boehm answer the attached
33 interrogatories in writing and under oath within thirty (30) days
34 from the date of service. Pursuant to Federal Rules of Civil
35 Procedure 26(c) you are requested to supplement your answers if you
36 become aware that the answers given are incorrect, misleading or
37 incomplete.

DEFINITIONS

2 Unless the question conclusively indicates otherwise, the
3 following definitions apply to the words used in these
4 interrogatories:

5 A. Person: The term "person" includes a corporation,
6 partnership, other business association or entity, a natural
7 person, and any government or government body, commission, board,
8 or agency;

9 B. Document: The term "document" is defined to mean and
10 include any and all graphic or physical representations, including
11 without limitation all handwritten, typed or printed material,
12 photographs, copies of all the foregoing, and material stored on
13 tape or any other magnetic medium;

14 C. Identification of Documents: When you are requested to
15 "identify" a document, you are requested to provide the following
16 with regard to each document:

17 (1) A description of the document with sufficient
18 particularity to enable the custodian of the document to respond to
19 a request for production or subpoena duces tecum for the document;

24 D. Identification of Natural Person: When you are requested
25 to "identify" a natural person, you are requested to provide the
26 following with regard to each such person:

(1) The name of the person:

- (2) The business address of the person
- (3) The residence of the person;
- (4) The business telephone number of the person;
- (5) The residence telephone number of the person;
- (6) The occupation of the person and the name of the employer of the person, if any.

E. "You" or "Your" means Sally Purser

INTERROGATORIES

9 1. As to each person identified in your Final Witness List,
10 describe in detail, including, but not limited to the following:

- a. How you first met;
- b. When you first met;
- c. Who introduced you;
- d. Where you first met;
- e. The nature of your relationship, how long it lasted, and why it ended;
- f. That person's knowledge of your alleged sexual contact with Defendant Boehm;
- g. That person's knowledge of your alleged drug use with Defendant Boehm;
- h. That person's facilitating or involvement with the activities described in subsection (f);
- i. That Person's facilitating or involvement with the activities described in subsection (g).

19 2. Identify each and every academic institution you attended,
20 including but not limited to the following:

- a. Name;
- b. Address;
- c. Phone number;
- d. Dates attended;
- e. Reason for leaving the institution;
- f. Highest grade level completed;
- g. Course of studies at each academic institution;
- h. Suspensions from each academic institutions;
- i. Expulsions from each academic institution;
- j. Activities leading to a suspension at each institution;
- k. Activities leading to an expulsion at each institution.

1 3. Identify all of your criminal convictions in detail as
2 follows:

3 a. date of arrest;
4 b. arresting agency;
5 c. initial charges filed against you;
6 d. charges you were convicted of;
7 e. sentencing requirements for each conviction;
8 f. probation requirements for each conviction.

9 4. Identify each and every drug rehabilitation facility you
10 have attended, including, but not limited to:

11 a. Name;
12 b. address;
13 c. phone number;
14 d. dates attended;
15 e. Reason for leaving;
16 f. certificates earned;
17 g. evaluations completed.

18 5. Identify each and every prescription drug prescribed to
19 you, including but not limited to:

20 a. Name of drug;
21 b. Date of prescription;
22 c. Treating physician;
23 d. Address of treating physician who prescribed
24 medication;
25 e. Phone number of treating physician who prescribed
26 medication;
27 f. Physical or mental ailment requiring each
28 prescription.

29 6. Is your response to each Request for Admission served with
30 these interrogatories an unqualified admission? If not, for each
31 response that is not an unqualified admission:

32 a. State the number of the request;
33 b. State all facts upon which you base your response;
34 c. State the names, addresses, and telephone numbers of
35 all persons who have knowledge of those facts;
36 d. Identify all documents and other tangible things that
37 support your response and state the name, address and
38 telephone number of the person who has each document
39 or thing.

REQUESTS FOR ADMISSION

2 1. Admit you smoked marijuana before initially meeting Defendant
3 Boehm;

4 2. Admit you smoked marijuana with your mother Kathleen Purser
5 before initially meeting Defendant Boehm;

6

7 3. Admit you snorted cocaine before initially meeting Defendant
8 Boehm;

9

10 4. Admit you snorted cocaine with your mother Kathleen Purser before
11 initially meeting Defendant Boehm;

12

13 5. Admit that you viewed your father being violent towards your
14 mother on several occasions;

15

16 6. Admit you engaged in sexual intercourse and/or oral sex with
17 individuals other than Defendants Boehm, Bolling or Williams
18 before the age of eighteen years old;;

19

20

21 7. Admit that you smoked "crack" cocaine before initially meeting
22 Defendant Boehm;

23

24 8. Admit that you smoked "crack" cocaine with your mother Kathleen
25 Purser before initially meeting defendant Boehm;

26

27 9. Admit that you drank alcohol before initially meeting Defendant
28 Boehm;

- 1 10. Admit that you drank alcohol with your mother Kathleen Purser
- 2 before initially meeting Defendant Boehm;
- 3
- 4 11. Admit that your mother Kathleen Purser physically assaulted you
- 5 on more than one occasion;
- 6
- 7 12. Admit that drug addiction is prevalent in your family;
- 8
- 9 13. Admit that You were sexually abused by your uncle;
- 10
- 11 15. Admit you were expelled from an academic institution for drug
- 12 sales;
- 13
- 14 16. Admit you worked as a prostitute on Chuchach Drive, also known
- 15 as "the track";
- 16
- 17 17. Admit you engaged in sexual intercourse and/or oral sex with
- 18 individuals other than Defendant Boehm, Bolling or Williams
- 19 before the age of sixteen years old;
- 20
- 21 18. Admit that you assisted in the day to day operations of an
- 22 escort service for Jay Whaley;
- 23
- 24 19. Admit that you sold drugs for Jay Whaley;
- 25
- 26 20. Admit that you had sexual relations with Jay Whaley before the
- 27 age of eighteen;
- 28

- 1 21. Admit that you were involved in a conspiracy to keep Defendant
- 2 Boehm high on drugs in order to steal money from him;
- 3
- 4 22. Admit that you have stated that Defendant Boehm was a victim of
- 5 Bambi Tyree, Leslie Williams and Allen Bolling;
- 6
- 7 23. Admit that your mother Kathleen Purser sold you for "crack
- 8 cocaine";
- 9
- 10 24. Admit that you traded sexual favors with individuals in
- 11 exchange for money and drugs other than the alleged occurrences
- 12 defendants Bolling, Williams and Boehm;
- 13
- 14 25. Admit that you traded sexual favors for money and drugs with
- 15 Carl Bucher before initially meeting Defendant Boehm;
- 16
- 17 26. Admit that defendants Tyree, Williams and Bolling laced
- 18 defendant Boehm's drugs and food with a foreign substance in
- 19 order keep him "High" and steal his money;
- 20
- 21 27. Admit that you worked as a prostitute at the direction of Jay
- 22 Whaley.
- 23
- 24 28. Admit that Defendant Boehm is not the cause of your drug abuse
- 25 history;
- 26
- 27
- 28

1 29. Admit that Defendant Boehm is not the cause of your history of
2 engaging in prostitution;

3
4 30. Admit that Defendant Boehm is not the cause of your history of
5 engaging in drug sales.

6
7 Dated: November 10, 2006 KENNER LAW FIRM, P.C.

8
9 By: 
10 David E. Kenner
11 Attorney for Defendant
12 Josef F. Boehm
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INTERROGATORY VERIFICATION

STATE OF ALASKA.

THIRD JUDICIAL DISTRICT

Sally Purser, being first duly sworn, upon oath, deposes and states:

I am the plaintiff in the above-entitled action; that I have read the responses to the Interrogatories and believe them to be true and correct to my knowledge and belief.

Sally Purser

SUBSCRIBED AND SWORN TO before me this _____ day of December,
2006.

NOTARY PUBLIC in and for Alaska.

My Commission Expires:

CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on this 10th day of November, 2006. I
3 caused a true and correct copy of the foregoing **DEFENDANT'S SECOND SET**
4 **OF DISCOVERY TO PLAINTIFF PURSER** The following parties were served via
5 U.S. Mail on November 10, 2006:

6 Pamela Sullivan, Esq.
7 733 West 4th Street
8 Suite 200
9 Anchorage, AK 99501

10 Allen K. Bolling
11 Inmate No: 14911-006
12 USP Terre Haute
13 U.S. Penitentiary
14 P.O. Box 12015
15 Terre Haute, IN 47801

15 Josef Boehm
16 Reg. # 14887-006
17 P.O. Box 5300
18 Adelanto, CA 92301

18 Bambi Tyree
19 c/o Mary Pate, Esq.
20 425 G. Street, Suite 930
21 Anchorage, Alaska 99501

22 Leslie Williams
23 Inmate No: 14903-006
24 FCI Yazoo City Medium
25 P.O. Box 5888
Yazoo City, MS 39194

22 | Dated: November 10, 2006

Rosie Ruiz

DEFENDANT'S SECOND SET OF DISCOVERY TO PLAINTIFF PURSER